

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

THE TRUSTEES OF PURDUE
UNIVERSITY,

Plaintiff,

v.

STMICROELECTRONICS N.V.,
STMICROELECTRONICS
INTERNATIONAL N.V., and
STMICROELECTRONICS, INC.,

Defendants.

CIVIL ACTION NO. 6:21-CV-00727-ADA

JURY TRIAL DEMANDED

PLAINTIFF'S NOTICE OF 30(b)(6) DEPOSITIONS OF DEFENDANTS

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, on October 13, 2022, at the offices of Holland & Knight, 1722 Routh Street, Suite 1500, Dallas, Texas 75201, counsel for The Trustees of Purdue University will take the videotaped deposition(s) of the designated representative(s) of Defendants STMicroelectronics International N.V. and STMicroelectronics, Inc. ("Defendants") best able to testify as to the matters set forth in Exhibit 1. Defendants have a duty to designate one or more officers, directors, managing agents, or other persons with sufficient knowledge to testify fully regarding the topics listed in Exhibit 1.

The deposition(s) will be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The above deposition(s) will be stenographically recorded and videotaped and will continue from day to day until completed.

- (e) when the simulations were run;
- (f) where the simulations were run;
- (g) the simulation results;
- (h) where the simulation results are stored;
- (i) whether the simulation results have been produced in this litigation; and
- (j) how and to whom the results of those simulations were reported.

33. For each and every Accused Product:

- (a) the part numbering conventions used;
- (b) the process flows used to manufacture each device;
- (c) the location(s) where the Accused Products are manufactured, packaged, and tested;
- (d) the differences in the process flows, including how each process flow differs from the others and how those differences will manifest themselves in the Accused Products;
- (e) the differences in structure, how each finished SiC MOSFET die differs from the others; and
- (f) any modules, systems, subsystems, or other products made, used, sold, offered for sale, or imported by Defendants that include or incorporate the Accused Products.

34. As to Your inequitable conduct affirmative defense:

- (a) the facts and evidentiary basis for Your claim that any undisclosed art was material to patentability;
- (b) the facts and evidentiary basis that the alleged undisclosed art was not cumulative of the prior art disclosed;
- (c) the facts and circumstances supporting your contention that Plaintiff or its prosecution counsel intended to defraud the U.S. Patent and Trademark Office;

(d) the reason You did not include the allegedly material prior art in Your Petition for Inter Partes Review; and

(e) the reason You did not include the alleged material prior art in Your Preliminary Invalidity Contentions.

35. As to any non-infringing alternatives or design-arounds that You contend exist for the patent-in-suit:

- (a) the changes, e.g., to the process flows, that would be required;
- (b) how the cost of production would be affected as a result of the change(s) in (a);
- (c) how the performance of the die would be affected as a result of the changes in (a);
- (d) whether the alleged non-infringing alternative to design around was actually

attempted, and if so:

- (i) when;
- (ii) where;
- (iii) by whom; and
- (iv) why it was not adopted.

36. The date(s) when Defendants first became aware of or received notice of the patent-in-suit.

37. As to any other products sold, offered for sale, imported, used, or made by You that include as a component an ST SiC MOSFETs (e.g. modules, subsystems, etc.):

- (a) the ST product number;
- (b) the customer product number;
- (c) the ST product data sheet;
- (d) the ST SiC MOSFET incorporated into the ST product;
- (e) the identity of the customers to whom ST sells the product;

Dated: September 23, 2022

Respectfully submitted,

By: /s/ Michael W. Shore

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COUNSEL FOR PLAINTIFF

THE TRUSTEES OF PURDUE UNIVERSITY

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via e-mail on September 23, 2022.

/s/ Michael W. Shore
Michael W. Shore